

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GARY NAPIER,

Plaintiff,

v.

MARIA PAPPAS, in her official capacity as
Treasurer and Ex Officio County Collector
of Cook County; MONICA GORDON, in her
official capacity as Clerk of Cook County,
COOK COUNTY, ILLINOIS, an Illinois
political subdivision unit of government;
KWAME RAOUL, in his official capacity as
Attorney General of the State of Illinois, and
DAVID HARRIS, in his official capacity as
Director of the Illinois Department of
Revenue,

Defendants.

Case No. 1:25 CV 5908

**PLAINTIFF'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE
RESPONSES TO MOTIONS TO DISMISS**

NOW COMES the Plaintiff, GARY NAPIER, by and through undersigned counsel, and, pursuant to F.R. Civ. P. 6(b), requests an enlargement of time for his Responses to the Defendants' Motions to Dismiss, until October 10, 2025. In support of his Motion, Napier states as follows:

1. On August 29, 2025, the Defendants filed Rule 12(b)(6) Motions to Dismiss (Dkt. ## 32, 35, 36). Napier's Response is due September 19, 2025 (Dkt. # 38).

2. However, despite due diligence, due to the immediate demands of Plaintiff's counsel's caseload, including imminently-due summary judgment

pleadings in *Miller v. Mueller*, 3:18 CV 3085 (C.D. Ill.), and preparation for oral arguments in *Harrel v. Raoul*, 24-3062 (7th Cir.) (cons. into *Barnett v. Raoul*, 24-3060 (7th Cir.)), Napier requests the due date for his Responses to Defendants' Motions to Dismiss be extended an additional 21 days, or until October 10, 2025. Any Replies would be due October 24, 2025.

3. Defendants have confirmed *via* e-mail that they do not oppose the request for relief sought in this Motion, and acknowledge the October 24, 2025 Reply due date.

4. This Motion is not filed for dilatory purposes or for delay, but only so Plaintiff may fully present his arguments before the Court.

WHEREFORE, the Plaintiff, GARY NAPIER, requests this Honorable Court grant him an enlargement of 21 days to October 10, 2025, to file his Response to Defendants' Motions to Dismiss, and grant him any and all other forms of relief as this Court deems just and proper.

Dated: September 16, 2025

Respectfully submitted,

By: /s/ David G. Sigale
Attorney for Plaintiff

David G. Sigale (Atty. ID# 6238103)
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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On September 16, 2025, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R. Civ. P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
Attorney for Plaintiff

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